

1 Leon Dayan, SBN 153162  
2 Abigail V. Carter\*  
3 Ramya Ravindran\*  
4 Lane M. Shadgett\*  
5 J. Alexander Rowell\*  
**BREDHOFF & KAISER P.L.L.C.**  
6 805 Fifteenth Street NW, Suite 1000  
7 Washington, D.C. 20005  
8 Tel. (202) 842-2600  
9 Fax (202) 842-1888  
10 ldayan@bredhoff.com  
11 acarter@bredhoff.com  
12 rravindran@bredhoff.com  
13 lshadgett@bredhoff.com  
14 arowell@bredhoff.com  
15 \*Application *pro hac vice* pending

16 Daniel Feinberg, SBN 135983  
17 Catha Worthman, SBN 230399  
18 Anne Weis, SBN 336480  
**FEINBERG, JACKSON, WORTHMAN**  
19 **& WASOW, LLP**  
20 2030 Addison Street, Suite 500  
21 Berkeley, CA 94704  
22 Tel. (510) 269-7998  
23 Fax (510) 269-7994  
24 dan@feinbergjackson.com  
25 catha@feinbergjackson.com  
26 anne@feinbergjackson.com

27 *Attorneys for Plaintiffs* (Additional Counsel not listed)

28 **UNITED STATES DISTRICT COURT**

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO, *et al.*, v. DONALD J. TRUMP, in his official capacity as President of the United States, *et al.*, Defendants.

**SAN FRANCISCO DIVISION**

27 Case No. 3:25-cv-03070-JD

28 **DECLARATION OF STEVEN K.  
URY**

29 Declaration of Steven K. Ury  
30 Case No. 3:25-cv-03070-JD

## **DECLARATION OF STEVEN K. URY**

I, Steven K. Ury declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the General Counsel of the Service Employees International Union (“SEIU”). I have been employed by SEIU for 22 years and served as General Counsel for the past two years. My office is located at the SEIU headquarters at 1800 Massachusetts Ave., N.W., Washington, D.C. 20036.

A. SEIU is an Organization of Diverse Working People United by the Belief in the Dignity and Worth of Workers and the Services They Provide.

3. SEIU represents approximately two million members in healthcare, the public sector, and property services. SEIU has over 150 affiliates across the United States, Puerto Rico, and Canada. In California, SEIU and our 17 local affiliates represent approximately one million workers in 58 counties across the state. In the Northern District of California, SEIU and our affiliates represent over 200,000 workers. SEIU members include physicians, technicians, long-term care workers, janitors, security officers, airport workers, librarians, childcare workers, educators, fast food workers, city, county, state, and federal employees, and many more.

4. Our work is guided by our vision for a just society where all workers are valued and all people respected—no matter where we are from or the color of our skin, where all families and communities can thrive, and where we leave a better and more equitable world for generations to come.<sup>1</sup>

5. To achieve this vision, SEIU's work is centered on forging a multi-racial, multi-generational, multi-lingual labor movement that builds worker power through unions, raises standards in workplaces and in communities, and—crucially—seeks to end poverty wages forever.<sup>2</sup>

<sup>1</sup> See SEIU 2024 Constitution and Bylaws, SEIU Mission Statement 5, available at <https://www.seiu.org/docs/2024SEIUConstitution&BylawsEnglish.pdf>.

https://doi.org/10.4236/ojs.201909054

1       6. Accordingly, SEIU supports workers in organizing their workplaces, and helps  
 2 workers enforce their rights through agencies at the state and federal level, including through the  
 3 National Labor Relations Board (“NLRB”), the Equal Employment Opportunity Commission  
 4 (“EEOC”), and the Occupational Safety and Health Administration (“OSHA”). After SEIU or an  
 5 affiliate has been recognized as the workers’ democratically-chosen exclusive representative, the  
 6 union—through the workers—negotiates collective bargaining agreements that set wages,  
 7 benefits, and working conditions. On average, union workers’ wages are 11.2% higher than their  
 8 nonunion counterparts, and 96% of union workers have employer-provided health insurance as  
 9 compared to only 69% of nonunion workers.<sup>3</sup> SEIU and our affiliates enforce these collective  
 10 bargaining agreements (“CBAs”) through grievance and arbitration procedures set forth in the  
 11 CBAs. We frequently negotiate for labor-management committees in which workers and their  
 12 employers can jointly address other issues of mutual concern, as well. SEIU and our affiliates  
 13 also advocate for local, state, and federal laws, regulations, policies, and programs that advance  
 14 our members’ interests.

15 **B. SEIU and/or our Affiliates Represent Approximately 80,000 Federal Sector  
 16 Employees Across Many Federal Agencies.**

17       7. SEIU, together with our affiliates, represent approximately 80,000 federal sector  
 18 employees in the United States, including nurses, doctors, other healthcare workers, police  
 19 officers, first responders, office workers, scientists, engineers, analysts, maintenance workers,  
 20 and many more.

21       8. SEIU and/or our affiliates represent workers at many federal agencies, including  
 22 the Department of Veterans Affairs (“VA”), the National Institutes of Health (“NIH”), the  
 23 Department of Transportation, the Department of the Interior, and the Environmental Protection  
 24 Agency (“EPA”). SEIU and/or our affiliates represent approximately 28,000 employees at the

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 27 <sup>3</sup> AFL-CIO, *Union Facts: The Value of Collective Voice*, available at <https://aflcio.org/formaunion/collective-voice>  
 28 (last visited on Apr. 3, 2025).

1 VA, an agency singled out by the White House as a purported example of the federal unions'  
 2 "war on President Trump's agenda."<sup>4</sup>

3       9.     The White House is correct that the work of these agencies is vital, but not  
 4 because of President Trump's pretextual contention that their work implicates national security  
 5 concerns. Rather, their work is crucial because the public, including SEIU members across  
 6 industries, rely on these agencies to implement, administer, and enforce laws duly enacted by  
 7 Congress. For instance, SEIU members depend on the EPA to set and enforce clean air and safe  
 8 water standards. SEIU members, specifically essential healthcare workers, trusted the NIH to  
 9 fund research on COVID-19 transmission risks, impacts on health and health care access, and  
 10 social and behavioral interventions to reduce virus transmission during the pandemic.

11       10.    SEIU members employed at the VA, in particular, provide a range of important  
 12 services to veterans, including other SEIU members. Our members provide medical and mental  
 13 health care to veterans, including as licensed practical nurses, health technicians, radiology  
 14 technicians, ultrasound technicians, advanced medical support assistants, medical support  
 15 assistants, patient administrative service providers, food service workers, cooks, housekeepers,  
 16 dental assistants, van drivers, and police officers. SEIU and/or our affiliates also represent  
 17 Information Technology employees who operate systems that manage veterans' benefits and  
 18 pensions. We likewise represent program analysts who develop, coordinate, and maintain  
 19 financial systems (accounting, budgeting, financial reporting), coordinate and synthesize  
 20 financial data, advise on financial policies and procedures, and review and report on program  
 21 accomplishments in financial terms. These jobs are critical to the effective and efficient delivery  
 22 of services to the nation's veterans.

23       11.    In California, specifically, SEIU represents approximately 1,700 employees at the  
 24 VA San Diego Hospital and area clinics.

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25       <sup>4</sup> The White House, *Fact Sheet: President Donald J. Trump Exempts Agencies with National  
 26 Security Missions from Federal Collective Bargaining Requirements* (Mar. 27, 2025)

27       <https://www.whitehouse.gov/fact-sheets/2025/03/fact-sheet-president-donald-j-trump-exempts-agencies-with-national-security-missions-from-federal-collective-bargaining-requirements/> (last visited Apr. 3, 2025).

1       12. SEIU's other federal employees in California are represented by SEIU affiliate,  
 2 National Association of Government Employees ("NAGE"), as further set forth in their  
 3 accompanying Declaration to the pending Motion.

4       **C. SEIU has Publicly Opposed the Trump Administration's Attacks on Working  
 5       People and their Unions.**

6       13. At SEIU's 2024 quadrennial Convention, which preceded the November  
 7 presidential election, SEIU members resolved to build power to raise standards in our industries  
 8 and communities, bargain better contracts, and win our fights for immigration, climate,  
 9 healthcare, and racial justice.

10       14. Many of the Trump Administration's actions are frontal assaults on SEIU's core  
 11 principles. As a result, SEIU, our affiliates, and our members have vigorously exercised—and  
 12 continue to exercise—our constitutionally-protected speech and petitioning rights to oppose  
 13 actions taken by the Trump Administration and Republican Congressmembers that advance an  
 14 anti-worker, anti-democratic agenda.

15       15. For instance, SEIU posted 23 press releases to our publicly-available website  
 16 since Trump's inauguration on January 20, 2025.<sup>5</sup> Twenty-two of these releases criticized actions  
 17 taken by the Trump Administration and/or Republican Congressmembers, and explained the  
 18 devastating consequences of these actions on working people. SEIU and our members have  
 19 spoken out to oppose Trump's Day One Executive Orders,<sup>6</sup> freezes to federal grants that hurt  
 20 working families,<sup>7</sup> cancellation of Temporary Protective Status for Venezuelan and Haitian

21       <sup>5</sup> My declaration focuses on SEIU's post-election speech and petitioning activities. However, there is a substantial  
 22 and well-documented public record reflecting SEIU's endorsement of President Trump's opponent, Kamala Harris,  
 23 and our investment of substantial resources to support her campaign. See, e.g., April Verrett, Newsweek, *SEIU  
 President: Kamala Harris Stands for America's Workers: Opinion* (Aug. 30, 2024), available at  
<https://www.newsweek.com/seiu-president-kamala-harris-stands-americas-workers-opinion-1946898> (last visited  
 Apr. 3, 2025); Francis Wilkinson, Bloomberg, *Harris' Secret Weapon is a Security Guard in Philly* (Oct. 29, 2024),  
 available at <https://www.bloomberg.com/opinion/articles/2024-10-29/harris-needs-philadelphia-voters-to-show-up-to-win-pennsylvania> (last visited Apr. 3, 2025).

25       <sup>6</sup> SEIU, *SEIU Statement on Donald Trump's Day One Executive Actions* (Jan. 20, 2025), available at  
<https://seiu.org/2025/01/seiu-statement-on-donald-trumps-day-one-executive-actions> (last visited Apr. 3, 2025).

26       <sup>7</sup> SEIU, *SEIU's Verrett: Trump's Order to Freeze Federal Grants Hurts Working Families* (Jan. 28, 2025), available  
 at <https://seiu.org/2025/01/seius-verrett-trumps-order-to-freeze-federal-grants-hurts-working-families> (last visited  
 Apr. 3, 2025).

1 immigrants,<sup>8</sup> DOGE's unprecedented access to personal data and government computer systems,<sup>9</sup>  
 2 threats to Medicaid funding,<sup>10</sup> and the administration's efforts to dismantle the Department of  
 3 Education.<sup>11</sup> Notably, just 13 days before the issuance of President Trump's executive order  
 4 entitled "Exclusions from Federal Labor-Management Programs" ("Exclusion Order"), SEIU  
 5 issued a press release criticizing the cancellation of the Transportation Security Administration  
 6 ("TSA") workers' union contract, which impacted AFGE members.<sup>12</sup> And just one day prior to  
 7 the issuance of the Exclusion Order, SEIU condemned the Trump Administration for detaining  
 8 immigrants with lawful status, including an SEIU member, in retaliation for their  
 9 constitutionally-protected First Amendment activity.<sup>13</sup>

10       16. SEIU leaders have also expressed the union's opposition to President Trump's  
 11 attacks on working people in many news outlets. For instance, SEIU President April Verrett has  
 12 addressed the detrimental impact of federal sector terminations on affected workers and their  
 13 families, and to entire communities that rely on services provided by federal agencies. President  
 14 Verrett also spoke about an SEIU lawsuit filed against the so-called Department of Government  
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16       <sup>8</sup> SEIU, *SEIU's Sáenz: Venezuelans with Temporary Protected Status contribute to our economy in countless ways -*  
 17 *sending them back is not only cruel, it's senseless* (Feb. 3, 2025), available at <https://seiu.org/2025/02/seius-saenz-venezuelans-with-temporary-protected-status-contribute-to-our-economy-in-countless-ways-sending-them-back-is-not-only-cruel-its-senseless> (last visited Apr. 3, 2025); SEIU, *SEIU's Verrett: Ripping Away TPS for Haitian Immigrants is a Direct Attack on Working Families, Our Economy* (Feb. 20, 2025), available at <https://seiu.org/2025/02/seius-verrett-ripping-away-tps-for-haitian-immigrants-is-a-direct-attack-on-working-families-our-economy> (last visited Apr. 3, 2025).

19       <sup>9</sup> See e.g., SEIU, *Unions Expand Suit to Block Elon Musk from Accessing Private Data at DOL, HHS and CFPB* (Feb. 13, 2025), available at <https://seiu.org/2025/02/unions-expand-suit-to-block-elon-musk-from-accessing-private-data-at-dol-hhs-and-cfpb> (last visited Apr. 3, 2025).

21       <sup>10</sup> See e.g., SEIU, *SEIU Members Nationwide Rally, Flood Congressional Town Halls During In-District Week of Action to Demand No Cuts to Medicaid* (Mar. 19, 2025), available at <https://seiu.org/2025/03/seiu-members-nationwide-rally-flood-congressional-town-halls-during-in-district-week-of-action-to-demand-no-cuts-to-medicaid> (last visited Apr. 3, 2025).

23       <sup>11</sup> See e.g., SEIU, *SEIU President April Verrett Condemns Executive Order to Dismantle Department of Education as Attack on Students and Working Families* (Mar. 20, 2025), available at <https://seiu.org/2025/03/seiu-president-april-verrett-condemns-executive-order-to-dismantle-department-of-education-as-attack-on-students-and-working-families-2> (last visited Apr. 1, 2025).

25       <sup>12</sup> SEIU, *SEIU's Verrett: Cancelling TSA contract cheats brave workers who keep our skies safe* (Mar. 14, 2025), available at <https://seiu.org/2025/03/seius-verrett-canceling-tsa-contract-cheats-brave-workers-who-keep-our-skies-safe> (last visited Apr. 3, 2025).

27       <sup>13</sup> SEIU, *Statement by SEIU President April Verrett on Tufts Graduate Student Detained by ICE* (Mar. 26, 2025), available at <https://seiu.org/2025/03/statement-by-seiu-president-april-verrett-on-tufts-graduate-student-detained-by-ice> (last visited Apr. 3, 2025).

1 Efficiency (“DOGE”), explaining that, absent court intervention, Elon Musk could potentially  
 2 access confidential Department of Labor complaints against his own companies. President  
 3 Verrett was also quoted in a USA Today article about the devastating consequences posed by  
 4 Trump’s threats to deport immigrants, including those in the caregiving industry who provide  
 5 crucial services that enable elderly individuals and individuals with disabilities to live with  
 6 dignity in their homes.<sup>14</sup>

7       17. SEIU has also joined other social justice, civil rights, and labor organizations in  
 8 issuing letters publicly opposing President Trump’s nominees to key posts, including Pam  
 9 Bondi’s nomination for U.S. Attorney General, Linda McMahon’s nomination for Secretary of  
 10 the Department of Education, Russell Vought’s nomination for Director of the U.S. Office of  
 11 Management and Budget, Bill Pulte’s nomination as U.S. Federal Housing Director, Harmeet  
 12 Dhillon’s nomination as Assistant Attorney General for Civil Rights in the Department of  
 13 Justice, and Paul Atkins’ nomination to serve as Chair of the U.S. Securities and Exchange  
 14 Commission.<sup>15</sup>

15       18. SEIU has routinely posted our opposition to various Trump Administration  
 16 actions to our publicly accessible social media channels, including Bluesky, X (formerly  
 17 Twitter), Instagram, and Facebook.<sup>16</sup> SEIU affiliates likewise shared SEIU’s social media posts,  
 18 and created their own posts criticizing the Trump Administration’s harmful attacks on working  
 19 people.

20 **D. SEIU has Filed and/or Participated in Numerous High-Profile Lawsuits Challenging  
 21 Actions Taken by the Trump Administration.**

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 23       <sup>14</sup> Rachel Barber, USA Today, *The caregiving industry relies on immigrants. These workers fear deportation under*  
*Trump* (Mar. 9, 2025), available at <https://www.usatoday.com/story/money/2025/03/09/immigrant-caregivers-fear-deportation-under-trump/80869591007/> (last visited Apr. 3, 2025).

24       <sup>15</sup> See, e.g., Letter from the Leadership Conference on Civil and Human Rights, *Oppose the Nomination of the*  
*Honorable Pamela Jo Bondi to be Attorney General of the United States* (Jan. 28, 2025), available at  
<https://civilrights.org/wp-content/uploads/2025/01/Civil-Rights-Community-Bondi-Opposition.pdf> (signatories also  
 include Plaintiffs AFL-CIO and American Federal of State, County & Municipal Employees).

25       <sup>16</sup> SEIU Bluesky handle, <https://bsky.app/profile/seiu.org>; SEIU X (formerly Twitter) handle, <https://x.com/SEIU>;  
 SEIU Instagram handle, [https://www.instagram.com/seiu\\_org/?hl=en](https://www.instagram.com/seiu_org/?hl=en), SEIU Facebook handle,  
<https://www.facebook.com/SEIU/> (last visited Apr. 3, 2025).

1       19. In addition to engaging in protected speech, SEIU and/or our affiliates have filed  
 2 numerous high-profile lawsuits against the Trump Administration.

3       20. In *AFL-CIO v. DOL*, SEIU, along with Plaintiffs American Federal of State,  
 4 County & Municipal Employees (“AFSCME”) and American Federation of Government  
 5 Employees (“AFGE”) along with several other plaintiffs, are challenging DOGE’s unprecedented  
 6 access to the Department of Labor, the Department of Health and Human Services, and the  
 7 Consumer Financial Protection Bureau.<sup>17</sup> The Plaintiffs allege *ultra vires* action, and violations of  
 8 the Administrative Procedure Act and the Privacy Act. In accordance with the district court’s  
 9 order, we are currently engaged in discovery.

10       21. In *Alliance for Retired Americans v. Bessent*, SEIU, along with AFGE and other  
 11 plaintiffs, are challenging DOGE’s unprecedented access to the Department of the Treasury as a  
 12 violation of both the Privacy Act and the Internal Revenue Code.<sup>18</sup>

13       22. In *Somerville Public Schools v. Trump*, SEIU, along with AFSCME Council 93  
 14 and other plaintiffs, are challenging the dismantling of the Department of Education for violating  
 15 separation of powers, the Take Care Clause, and the Administrative Procedure Act, in addition to  
 16 constituting *ultra vires* action.<sup>19</sup>

17       23. NAGE, an SEIU affiliate, is one of the plaintiffs in *AFGE v. Ezell*, which  
 18 challenges the “fork in the road” directive.<sup>20</sup>

19       24. SEIU also filed an *amicus curiae* brief in support of the plaintiff states and  
 20 unnamed physicians in *Washington v. Trump*, a challenge to President Trump’s Executive Order  
 21 banning gender-affirming care for youth and minors.<sup>21</sup> In our brief, SEIU explained the untenable  
 22 situation healthcare providers face: to fulfill their ethical duty to provide life-saving care to their  
 23 patients or risk the threat of criminal prosecution and the loss of critical funding to their health  
 24 systems. The plaintiffs prevailed on their motion for a temporary restraining order. The district

25       <sup>17</sup> No. 1:25-cv-00339 (D.D.C.).

26       <sup>18</sup> No. 1:25-cv-00313 (D.D.C.).

27       <sup>19</sup> No. 1:25-cv-10677 (D. Mass.).

28       <sup>20</sup> No. 1:25-cv-10276 (D. Mass.).

29       <sup>21</sup> No. 2:25-cv-00244 (W.D. Wash.).

1 court subsequently granted, in part, the plaintiffs' motion for preliminary injunction. The federal  
 2 government defendants are currently appealing that order.

3 **E. SEIU and our Affiliates are Suffering Irreparable Harm from the Exclusion Order.**

4 25. The Exclusion Order and the accompanying Fact Sheet have damaged and will  
 5 continue to damage SEIU, our affiliates, and our members. The Exclusion Order and the  
 6 accompanying Fact Sheet have also disrupted and will continue to impede our ability to represent  
 7 SEIU members.

8 26. The majority of SEIU and/or our affiliates' federal sector members are subject to  
 9 the Exclusion Order. Losing the CBAs themselves will irreparably harm SEIU, as they are the  
 10 result of decades of relationship-building between the union and agency management where both  
 11 parties have worked together with the mutual goal of advancing the agency's mission for the  
 12 benefit of the public. In negotiating these CBAs, the union made concessions in exchange for  
 13 better workplace conditions and protections for our members. Without the CBAs, this valuable  
 14 labor-management relationship will be lost as will the gains and protections for SEIU's members.

15 27. Among the CBA protections that will be lost are those that govern how an agency  
 16 can conduct a reduction in force ("RIF"). Those CBA provisions, which address notice and  
 17 bargaining unit worker rights during and after a RIF, are essential to SEIU at this moment when  
 18 mass RIFs are being carried out throughout the federal government and are affecting SEIU  
 19 members. At the VA alone, RIFs are expected to lay off 80,000 workers.<sup>22</sup>

20 28. SEIU's ability to represent our members at this time when mass RIFS are being  
 21 carried out against them will be severely affected by the loss of the CBA RIF protections for  
 22 which SEIU and our affiliates bargained.

23 29. As required by federal statute, SEIU's CBAs all contain a Negotiated Grievance  
 24 Procedure ("NGP"). This procedure establishes a mutually agreed upon process whereby the  
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26 <sup>22</sup> See Stephen Groves, AP News, *Trump administration plans to cut 80,000 employees from Veterans Affairs,*  
 27 *according to internal memo* (Mar. 5, 2025) available at <https://apnews.com/article/veterans-affairs-cuts-doge-musk-trump-f587a6bc3db6a460e9c357592e165712> (last visited Apr. 3, 2025).

1 union and the agency may efficiently resolve matters premised, not only on CBA provisions, but  
2 also on other agreed upon sources of authority such as rules, regulations, and statute.

3       30.     The NGP is a key component of the labor-management relationship that advances  
4 the mission of agencies throughout the federal government where SEIU members are employed.  
5 It is also an essential avenue for cooperative problem-solving that SEIU regularly employs to  
6 address workplace matters.

7       31.     Eliminating the NGP will significantly impair SEIU's ability to represent its  
8 members during this period of severe workplace upheaval.

9       32.     The Exclusion Order also does away with SEIU offices and communications at  
10 federal agencies. Union offices are SEIU's physical presence where members gather,  
11 communicate, and engage in mutual aid. SEIU's communications through workplace methods  
12 such as email are a key way in which members organize themselves to act collectively to  
13 maintain dignified working conditions and uphold the quality of federal services.

14       33.     Eliminating SEIU workplace offices and communications serves to erase SEIU  
15 from the workplace and attacks the bond between SEIU and our members.

16       34.     The Exclusion Order also seeks to eliminate payroll deduction. Accordingly, the  
17 Exclusion Order will immediately eliminate most of the revenue SEIU and/or our affiliates  
18 receive from executive branch employees. Dues are used to support negotiations, bargaining, and  
19 enforcement of CBAs, which are essential to promoting productive labor relations, maintaining  
20 labor peace, and delivering effective, quality services to the public.

21       35.     Signing up members on alternative forms of payment, such as recurring  
22 deductions from their bank accounts, is a timely and costly endeavor. Such deductions require  
23 compliance with technical federal laws and regulations. Even if SEIU and/or our affiliates are  
24 able to sign members up on recurring deductions, there will be a lag time during which no dues  
25 will be remitted to the union.

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36. Moreover, it is certainly possible that, without the guarantee of a CBA protections, some members may forego union membership, meaning that dues revenue would cease altogether, particularly if they feel federal unions are being targeted by their employer.

37. For the foregoing reasons, SEIU, its affiliates, and our members will suffer irreparable harm unless the Exclusion Order is enjoined.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed April 3, 2025, in Washington, D.C.

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Steven K. Ury